

# KING & SPALDING

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July 20, 2015

## **VIA E-MAIL TRANSMISSION AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding (i) Status of Pillars' No Stay  
Pleading and the Ruling By The Court on  
June 16, 2015, and (ii) an Update on Other Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. We write to provide the Court, pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], with an update on developments in proceedings relating to New GM’s Motions to Enforce.

### **Pillars Matter**

New GM writes to inform the Court that, on July 17, 2015, it filed with the United States District Court for the Eastern District of Michigan (“Michigan District Court”), in the case captioned *Pillars v. General Motors LLC*, Case No. 15-11360 (“Pillars Lawsuit”), the *Defendant General Motors LLC’s Motion For Leave To File Amended Notice Of Removal And Amended Answer (“Motion to Amend”)*. The Motion to Amend seeks authority from the Michigan District Court for New GM to amend its Answer and Notice of Removal filed in the Pillars Lawsuit to correct the inadvertent error respecting the language found in Section 2.3(a)(ix) of the Sale Agreement and in the First Amendment to the Sale Agreement. Also on

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July 17, 2015, the Michigan District Court entered an *Order Directing Expedited Response* (“**Expedited Order**”), directing the Plaintiff to file an expedited response to the Motion to Amend by July 21, 2015; New GM may file an expedited reply by July 23, 2015. A copy of the Motion to Amend and Expedited Order are attached hereto as Exhibits “1” and “2” respectively.

**Update on Other Related Proceedings**

On July 17, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,<sup>1</sup> is attached hereto as Exhibit “3.”

Respectfully submitted,

*/s/ Arthur Steinberg*

Arthur Steinberg

AJS/sd  
Encl.

cc: Victor J. Mastromarco (counsel for Mr. Pillars)  
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<sup>1</sup> There are 35 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.